



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

July 24, 2003

Jo Olchawa, Treasurer  
San Bernardino County Republican Central  
Committee  
10681 Foothill Boulevard, Suite 330  
Rancho Cucamonga, CA 91730

Identification Number: C00014092

Reference: Mid-Year (1/1/01-6/30/01) and Year End (7/1/01-12/31/01) Reports

Dear Ms. Olchawa:

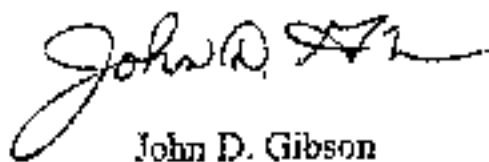
This letter is to inform you that as of July 23, 2003 the Commission has not received your response to our requests for additional information dated July 2, 2003. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

Due to recent events, the United States Postal Service is experiencing delays in the processing and delivery of mail for the Washington D.C. area. Consequently, the Federal Election Commission is not in receipt of all incoming mail. The Commission recommends that you resubmit your response to this notice and consider using alternate delivery services such as overnight delivery or delivery by courier. If feasible, your response can also be hand-delivered. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.FEC.gov](http://www.FEC.gov).

An adequate response must be received at the Commission by August 13, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you have any questions regarding this matter, please contact Scott Walker on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division), our local number is (202) 694-1130.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

Jo Olchawa, Treasurer  
San Bernardino County Republican Central Committee  
10681 Foothill Blvd., Suite 330  
Rancho Cucamonga, CA 91730

JUL 02 2003

Identification Number: C00014092

Reference: Year End Report (7/1/01-12/31/01)

Dear Ms. Olchawa:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-A review of the reports filed by your committee (pertinent portion(s) attached) indicates that your committee received one or more transfers from the Democratic State Central Committee of California which has not been disclosed on their report(s) of receipts and disbursements. Please provide clarifying information regarding the source of the transfer(s) received by your committee.

-Schedule H3 discloses the receipt of \$17,537.82 from your non-federal account for administrative/voter drive activity that is listed as 100% non-federal on Schedule H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, 100% non-federal administrative/voter drive activity does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount

## SAN BERNARDINO COUNTY REPUBLICAN CENTRAL COMMITTEE

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received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H3 of your report discloses "S.B. County Rep Central Comm." as the name of account for the transfers received from your non-federal account for shared activity. Please verify that these transfers were in fact received from your committee's non-federal account and amend your report with clarifying information.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state or local party committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. 11 CFR §106.5(d)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be provided during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Schedule H4 of your report discloses disbursements for the "Administrative/Voter Drive" category which use a ratio that is inconsistent with the ratio disclosed on Schedule H1 for the 2001-2002 election cycle. The ballot composition ratio for the allocation of administrative and generic voter drive expenses should be the same for the full two-year election cycle. Please amend your report to clarify this apparent discrepancy.

## SAN BERNARDINO COLNTY REPUBLICAN CENTRAL COMMITTEE

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Please note that if your non-federal account has overpaid your federal account because of this miscalculation, it will be necessary to immediately transfer these funds back to the non-federal account. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker  
Senior Campaign Finance Analyst  
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)  
ITEMIZED RECEIPTS**

 Use separate schedule(s)  
or attach summary of the  
Detailed Summary Page

 FOR LINE NUMBER: PAGE: 8 / 20  
☐ 11 ☒ 12 ☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF COMMITTEE (in Full)  
 S.B. COUNTY REP. CENTRAL COMM.

Full Name (Last, First, Middle Initial)		Date of Receipt
A. CALIFORNIA REPUBLICAN PARTY		06 27 2004
Mailing Address		
1808 W. MAGNOLIA BLVD		
City	State	Zip Code
EVANSTON	CA	94504
FEC ID Number of contributing federal political committee		Amount of Each Receipt This Period
C00140580		13.50
Name of Employer	Occupation	VOTER REGISTRATION BOUNTY
Receipt For		Aggregate Year-to-Date *
Primary	General	13.50
Other (specify) *		Transaction ID: SA11B.6643

Full Name (Last, First, Middle Initial)		Date of Receipt
B. CALIFORNIA REPUBLICAN PARTY		11 20 2004
Mailing Address		
1808 W. MAGNOLIA BLVD		
City	State	Zip Code
BURBANK	CA	91506
FEC ID Number of contributing federal political committee		Amount of Each Receipt This Period
C00140580		2249.75
Name of Employer	Occupation	VOTER REGISTRATION BOUNTY
Receipt For		Aggregate Year-to-Date *
Primary	General	2249.25
Other (specify) *		Transaction ID: SA11B.5770

SUBTOTAL of Receipts This Page (optional) .....	2249.25
TOTAL This Period (this page (this line NUMBER ONLY)) .....	2249.25

FEC SCHEDULE A (Revised 1/2003)

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